

Hearing Date: March 23, 2021 at 10:00 a.m. (ET)
Objection Deadline: March 16, 2021 at 4:00 p.m. (ET)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:	:	CHAPTER 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i>,	:	CASE NO. 18-23538-RDD
	:	
Debtors	:	
	:	
	:	
	:	
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**NOTICE OF HEARING FOR THE
MOTION BY ERIE INSURANCE COMPANY FOR RELIEF FROM AUTOMATIC STAY**

PLEASE TAKE NOTICE that, on February 12, 2021, the Erie Insurance Company (the “**Movant**”) filed the Motion by Erie Insurance Company for Relief from Automatic Stay [ECF No.] (the “**Motion**”) seeking entry of an order granting the Movant relief from the automatic stay imposed under Section 362(a) of the Bankruptcy Code, so as to permit Movant to proceed with its damages action pending against Debtor Sears, Roebuck and Company in the matter of *Erie Insurance Company, as subrogee of Charles and Joyce Sparwasser, v. Sears, Roebuck & Co., et al.*, Circuit Court for Baltimore County, Maryland, case no. C-03-CV-20-003262.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New

York, in the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 (the “**Bankruptcy Court**”), on March 23, 2021 at 10:00 a.m. (prevailing Eastern Time) (the “**Hearing**”), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion and the relief requested therein, if any, must be made in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules, and shall be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern Time) on March 16, 2021 (the “**Objection Deadline**”) (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on CD-ROM, in text searchable portable document format (PDF) (with a hard copy delivered directly to the Chambers of Judge Shelley C. Chapman), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, so as to be filed and received no later than the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Motion, with proof of service, is filed with the Bankruptcy Court and a courtesy copy delivered to the Honorable Robert D. Drain’s chambers by the Objection Deadline, the Movant may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order attached to the Motion, which order may be entered with no further notice or opportunity to be heard.

Dated: New York, New York
February 12, 2021

/s/ James C. Vandermark
James C. Vandermark